

### REMARKS

This Application has been carefully reviewed in light of the Final Office Action mailed September 7, 2004. Claims 1-3 and 5-28 were pending in the Application. In the Office Action, Claims 1-3 and 5-28 were rejected. In order to expedite and advance the prosecution of the present Application, Applicants amend Claims 1, 12 and 19 and add new Claims 29-33. Thus, Claims 1-3 and 5-33 remain pending in the Application.

In the Office Action, the following actions were taken or matters were raised:

### SECTION 102 REJECTION

The Examiner rejected Claims 1-2, 5-6, 8-11 and 26-27 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,016,401 issued to Rostoker et al. (hereinafter "*Rostoker*"). Applicants respectfully traverse this rejection.

To anticipate a claim, each and every limitation must be found in a reference. In addition, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claims" and "[t]he elements must be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 USPQ 2d 1566 (Fed. Cir. 1990); MPEP § 2131.

Applicants respectfully submit that *Rostoker* does not disclose or even suggest each and every limitation of amended independent Claim 1. For example, Applicants respectfully submit that *Rostoker* does not disclose or even suggest a graphics adapter having "a frame buffer operable to store graphics image data rendered by the graphics adapter" as recited by amended independent Claim 1 (emphasis added). *Rostoker* is apparently directed toward a digital video network apparatus for compressing data streams such as digitized images and full motion video (e.g., from sources such as a computer, video camera, microphone, digitizer or CD-ROM drive) for moving the data streams over a network (*Rostoker*, column 7, lines 19-31, figure ). Thus, *Rostoker* does not appear to disclose or even suggest rendering of image data at the digital video network apparatus of *Rostoker* identified by the Examiner. Therefore, for at least this reason, *Rostoker* does not anticipate amended independent Claim 1.

Claims 2, 5-6 and 8-11 that depend from independent Claim 1 are also not anticipated by *Rostoker* at least because they incorporate the limitations of Claim 1 and also they add additional elements that further distinguish *Rostoker*. Therefore, Applicants respectfully request that the rejection of Claims 2, 5-6 and 8-11 be withdrawn.

Applicants further submit that *Rostoker* does not disclose or even suggest each and every limitation of independent Claim 26. For example, Applicants respectfully submit that *Rostoker* does not disclose or even suggest “a network attachable graphics chip coupled to said frame buffer” where “said network attachable graphics chip compris[es] a graphics unit operable to render a graphics image” as recited by independent Claim 26 (emphasis added). With respect to independent Claim 26, the Examiner states that independent Claim 26 is similar in scope to independent Claim 1 (prior to amendment by this paper), and thus the rejections to independent Claim 1 are also applicable to independent Claim 26 (Office Action, page 4). However, with respect to rendering of a graphics image, the Examiner refers to reference numeral “307” of *Rostoker* as a graphics unit of a “graphics chip 300” of *Rostoker* (Office Action, page 4). Applicants respectfully disagree. Reference numeral “307” of *Rostoker* referred to by the Examiner is a video display of a computer 302 of *Rostoker* disposed remote from the digital video network apparatus 300 of *Rostoker* (*Rostoker*, figure 1). Therefore, reference numeral “307” of *Rostoker* is apparently not a graphics unit of the apparatus 300 as proposed by the Examiner. Accordingly, for at least this reason, *Rostoker* does not anticipate independent Claim 26. Therefore, Applicants respectfully request that the rejection of independent Claim 26 be withdrawn.

Claim 27 that depends from independent Claim 26 is also not anticipated by *Rostoker* for at least the reasons discussed above, and additionally at least because Claim 27 incorporates the limitations of Claim 26 and also it adds additional elements that further distinguish *Rostoker*. Therefore, Applicants respectfully request that the rejection of Claim 27 be withdrawn.

SECTION 103 REJECTION

The Examiner rejected Claims 3, 7 and 28 under 35 U.S.C. § 103(a) as being unpatentable over *Rostoker*. The Examiner also rejected Claims 12-25 under 35 U.S.C. § 103(a) as being unpatentable over *Rostoker* in view of U.S. Patent No. 6,304,895 issued to Schneider et al. ("*Schneider*"). Applicants respectfully traverse these rejections for at least the reasons discussed below.

Claims 3 and 7 depend from independent Claim 1, and Claim 28 depends from independent Claim 26. For at least the reasons discussed above, independent Claims 1 and 26 are allowable over the cited reference. Therefore, Claims 3, 7 and 28 are also allowable, and Applicants respectfully request that the rejection of Claims 3, 7 and 28 be withdrawn.

Of Claims 12-25, Claims 12 and 19 are independent. Applicant respectfully submits that the proposed combination of *Rostoker* and *Schneider* does not disclose, teach or suggest all the elements of amended Claims 12 and 19. For example, neither *Rostoker* nor *Schneider*, alone or in combination, disclose, teach or suggest "logically dividing a frame buffer of a graphics adapter into a plurality of segments" where "at least one segment of said plurality of segments stor[es] graphics image data rendered by the graphics adapter" as recited by amended Claim 12, or "comparing graphics image data of a new image for a particular destination device of a plurality of destination devices with graphics image data of a previous image for said particular destination device stored in a frame buffer of a graphics adapter remote from said particular destination device, said graphics adapter rendering said graphics image data for said new image and said previous image" as recited by amended Claim 19. As described above, the Examiner has not identified any disclosure or teaching in *Rostoker* regarding rendering of graphics image data in the device of *Rostoker*, and *Schneider* does not remedy the deficiencies of *Rostoker*. Therefore, for at least this reason, Applicants respectfully submit that the rejection of Claims 12 and 19 be withdrawn.

Claims 13-18 depend from independent Claim 12, and Claims 20-25 depend from independent Claim 19. For at least the reasons discussed above, independent Claims 12 and 19 are patentable over the cited references. Therefore, Claims 13-18 and 20-25 that depend respectively from independent Claims 12 and 19 are also patentable. Therefore, Applicants respectfully request that the rejection of Claims 13-18 and 20-25 be withdrawn.

NEW CLAIMS

Applicants add new Claims 29-33. New Claims 30-33 depend from new independent Claim 29. New independent Claim 23 recites, in part, “a graphics unit adapted to render graphics image data,” “a frame buffer,” and “a network interface operable to . . . format said received graphics image data into a plurality of packets for transmission over a communication network.” The cited art, alone or in combination, do not disclose, teach or suggest the limitations of new independent Claim 29. Therefore, Applicants respectfully request allowance of new independent Claim 29 and new Claims 30-33 that depend from new independent Claim 29.

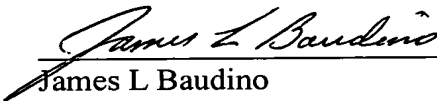
**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

An RCE filing fee of \$968.00 is believed due with this RCE. The Commissioner for Patents and Trademarks is hereby authorized to charge Deposit Account No. 08-2025 of Hewlett-Packard Company the amount of \$968.00 to satisfy the RCE filing fee. If, however, Applicant has miscalculated the fee due with this RCE, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this RCE to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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